

GEORGE D. FRAME, LTD.  
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 John Dutkin, Trustee

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U.S. BANKRUPTCY COURT  
 MARY A. SCHOTT, CLERK

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

USA COMMERCIAL MORTGAGE COMPANY, ) Case No. BK-S-06-10725 LBR  
 ) Case No. BK-S-06-10726-LBR  
 Debtor.) Case No. BK-S-06-10727-LBR

In re: ) Case No. BK-S-06-10728-LBR  
 ) Case No. BK-S-06-10729-LBR

USA CAPITAL RALTY ADVISORS, LLC. )  
 ) Chapter 11  
 Debtor.)

In re: )  
 ) Jointly Administered Under  
 USA CAPITAL DIVERSIFIED TRUST DEED ) Case No. BK-S-06-10725 LBR  
 FUND, LLC, )

Debtor.)

In re: )

USA CAPITAL FIRST TRUST DEED FUND, )  
 LLC, )

Claim No. 10725-01395

Debtor.)

In re: )

MOTION TO FILE ON PAPER

USA SECURITIES, LLC, )

Debtor.)

Affects: )

Hearing date: October 15, 2007

Hearing time: 9:30 a.m.

☐ All Debtors )

☒ USA Commercial Mortgage Co. )

☐ USA Securities )

☐ USA Capital Realty Advisors, )

LLC )

☐ USA Capital Diversified Trust )

Deed Fund, LLC )

☐ USA First Trust Deed Fund, LLC )

1. Movant GEORGE D. FRAME, ESQ., of GEORGE D. FRAME, LTD. hereby

1 declares an exemption or requests permission to file documents on paper  
2 because:

3 ☒ a. Movant is not a regular filer as the term is defined in LR  
4 5005(a)(1).

5 ☐ b. Movant claims an exemption under LR 5005(a)(4) because  
6 (state why):  
7 \_\_\_\_\_  
8 \_\_\_\_\_

9 ☐ c. Exceptional circumstances exist pursuant to LR 5005(a)(5)  
10 which prevent filing by electronic means because:

11 ☐ (1) Movant's internet service is not available due to  
12 circumstances that cannot be prevented.

13 (i) Describe the nature and extent of the  
14 circumstances that have made the internet service  
15 unavailable (be specific):  
16 \_\_\_\_\_  
17 \_\_\_\_\_

18 (ii) Describe what steps will be taken to ensure  
19 that the internet service will be operable for  
20 electronic filing in the future:  
21 \_\_\_\_\_  
22 \_\_\_\_\_

23 ☒ (2) Other grounds exist for the exception circumstance  
24 motion (be specific):

25 As previously stated in this case, counsel is retiring,  
26 does not maintain full time office or secretary, and  
27 does not operate a computer or have knowledge of or use  
28 internet. Counsel does not take work in bankruptcy  
court due to electronic filing. However, this case is a  
part of a trust estate (Dutkin) which must be concluded  
and is sole case with need to file on paper.

1                   ■       (3) Movant has filed a prior exceptional circumstances  
2 motion.

3                               (i) Number of prior motions: Cannot recall.

4                               (ii) Date of prior motions: 2003/2004 & this  
5 case 4-19-07.

6                               (iii) Reason for prior motions: Cannot use  
7 computer or internet, & retiring.

8                               (iv) Case number and disposition for each prior  
9 motion: Other than this case - cannot  
10 recall. This case - granted.

11                   2. The document that the movant wants to file on paper is:

12 RESPONSE OF JOHN DUTKIN, TRUSTEE, TO MOTION FOR SUMMARY JUDGMENT &  
13 OBJECTION OF USA COMMERCIAL MORTGAGE COMPANY TO CLAIM OF DUTKIN  
14 TRUST ASSERTING SECURED STATUS.

15 Based upon the foregoing, the movant asks the court to grant this  
16 motion.

17 DATED this 12 day of August, 2007.

18 GEORGE D. FRAME, LTD.

19 By George D. Frame  
20 George D. Frame, Esq.  
21 601 Greenway Rd., Ste. D  
22 Henderson, NV 89002

23 Attorney for Joint Successor  
24 Trustees of John Dutkin Revoc.  
25 Liv. Trust Dated Jan. 17, 2000

26 Claimant No. 10725-01395  
27  
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